Comments on the current plan for BPL deployment.

1. Part 15 restrictions are inadequate for BPL. Part 15 restrictions were designed to prevent isolated radiators with small antennas from interferring with licensed radio services. The proposed BPL service will create city scale antenna systems in the power lines. Taken as a system, the effective power and antenna sizes involved make BPL an extremely serious source of interference to other licensed services using the HF frequency bands. That difference is significant and needs to be reflected in the rule making process.

2. BPL interference will not be a local effect. The HF frequency spectrum is a national and international resource that needs to be protected from unnecessary pollution. Unlike the line-of-sight VHF, UHF and above frequency spectrum, HF is used for long distance communication. Broadband noise radiated from power lines carrying BPL signals will propagate over those long continental and intercontinetal paths just as transmissions from licensed HF services do. The ability for licensed services on the HF band to function effectively is limited by the background noise floor which limits the ability to receive weak signals. This observation also implies that a small scale field trial will not exhibit the cumulative impact of propagated noise from BPL when it is implemented on a national scale.

3. The Amateur Radio Service is an important contributor to national security and disaster response. Its ability to perform that function effectively is seriously threatend by BPL when implemented on a national scale.

In light of these considerations, I would propose that the FCC consider modifying its rules on BPL to prevent emissions in the HF spectrum. The most practical method for doing this in my opinion would be to restrict BPL to using frequency spectrum above the HF bands. I understand that some BPL vendors have in fact designed such systems, and I respectfully petition the FCC to require that choice in its rule making.